

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION
DEC 17 11 35 AM '81
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

For Six Month Period Ending NOV 13 1981
(Insert date)

Name of Registrant

Registration No. 1815

Prather Seeger Doolittle & Farmer

Business Address of Registrant

1101 Sixteenth Street, N.W.
Washington, D.C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

N.A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
------	----------------------	-------------	----------	-----------------

-
5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☐ N.A.

If yes, identify each such person and describe his services.

-
6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated
------	------------------------	-----------------

-
7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
------	----------------------	---------------------------	--------------------------

7-10-1957
10-11-1957
10-11-1957

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Empresa de Transporte Aereo del Peru

Joseph E. Seagram & Sons, Inc.

The Royal Bank of Canada

Ruhrkohle, A.G.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

The Royal Bank of Canada: in addition to general legal services, corresponding and meeting with various officials from the State Department and Treasury Department on U.S.-Canadian banking relations; preparation of a memorandum comparing the treatment of foreign banks in the U.S. with the treatment of foreign banks in Canada; distributing this memorandum to various Executive officials; and advising Royal Bank with respect to all of the above.

Ruhrkohle, A.G.: in addition to general legal services, discuss funding for and future of the SRC-II coal liquefaction project with officials at the White House, Departments of State and Energy, members of the Congress, and Congressional staffs.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Royal Bank of Canada: Canada's proposed National Energy Policy and the actions of its Foreign Investment Review Agency have stirred cries of discrimination in the U.S. business community, and, in some cases, prompted calls for retaliation against Canadian interests in the U.S. On behalf of the Royal Bank, we have sought to demonstrate to U.S. officials that, whatever the merits of the disputes in those areas, they should not be allowed to affect the national treatment policies which each country has recently worked so hard to achieve in the banking area. These views have been communicated through meetings with various officials in the Executive Branch and through the dissemination of a memorandum entitled "Banking Relations Between The U.S. and Canada: National Treatment Is Working On Both Sides of the Border."

Ruhrkohle, A.G. is a private German corporation participating with the Federal Republic of Germany in the SRC-II synthetic fuels project. As such, they were interested in the continuation of U.S. funding for the project. On behalf of Ruhrkohle, we spoke and/or met with officials at the White House, the Departments of State and Commerce, members of the Congress, and Congressional staff members regarding the project.

-
13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
-------------	------------------	----------------	---------------

See Attachment

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
--------------------------------------	--------------------------	--	----------------

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
During the reporting period, the following disbursements were made on behalf of The Royal Bank of Canada for photocopying, courier, messenger, telephone, postage and travel activities:			
Reporting Period		C&P Telephone	\$1,366.66
Reporting Period		Courier & Messenger Services - Sky Courier, Metro Messenger	1,563.13
Reporting Period		Photocopying - Xerox, Eastern Photo	1,437.66
Reporting Period		Postage - U.S. Post Office	244.21
Reporting Period		Local travel - taxis, etc.	167.10
Reporting Period		Entertainment - business meals, etc.	449.55
Reporting Period		Data from Federal Reserve Board Data Bank	662.50
Reporting Period		Travel to Montreal, Canada and New York	560.11

\$6,450.92

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
----------------------	-------------------------------------	--	--------------------------------------	----------------

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
5/20/81	\$100	Brademas Testimonial Committee	John Brademas
5/22/81	\$100	Friends of Phil Sharp	Phil Sharp
5/28/81	\$250	Relect Senator Chafee Committee	John Chafee
11/2/81	\$ 10	Wanda Washburn (D.C. School Board)	Wanda Washburn

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

The Royal Bank of Canada

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☒ Other (specify) — Memoranda

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☒ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☒ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following: N.A.

Exhibit A⁶ Yes ☐ No ☐

Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ N.A.

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Thomas L. Farmer

THOMAS L. FARMER

Gary M. Welsh

GARY M. WELSH

Subscribed and sworn to before me at 1101-16th St. N.W., Wash. D.C.

this 11th day of December, 19 81

[Signature]

(Signature of notary or other officer)

My Commission Expires May 31, 1986

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

ATTACHMENT ITEM 14(a)

Receipts of monies from Royal Bank of Canada^{*/} during the reporting period

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
11/9/81	Fee	\$19,175.00
	Reimbursement for Expenses	591.12
11/5/81	Fee	\$ 4,540.00
	Reimbursement for Expenses	1,786.12
9/16/81	Fee	\$9,875.00
	Reimbursement for Expenses	689.43
7/27/81	Fee	\$13,000.00
	Reimbursement for Expenses	1,523.32
6/3/81	Fee	\$5,700.00
	Reimbursement for Expenses	664.49
6/29/81	Fee	\$10,000.00
	Reimbursement for Expenses	726.36
		<u>\$68,269.84</u>

^{*/} Fees and reimbursements represent payments for both registrable and exempt activities during this period.

Receipts of monies from Ruhrokhle during reporting period:

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
5/22/81	Fee	\$12,274.32
	Reimbursement for Expenses	2,725.68
7/8/81	Fee	<u>\$35,225.68</u>
		<u>\$50,225.68</u>

15. (a) Disbursements -Monies (continued)

During the reporting period, the following disbursements were made on behalf of Ruhrkohle, A.G.:

Reporting Period	C&P Telephone	\$1,332.31
Reporting Period	ITT - telex	632.22
Reporting Period	Courier & Messenger Services - Sky Courier, Metro Messenger	545.78
Reporting Period	Photocopying - Xerox, Eastern Photo	148.80
Reporting Period	Postage - U.S. Post Office	36.26
Reporting Period	Entertainment - business meals, etc.	892.98
Reporting Period	Travel to New York, Pittsburgh and Tokyo	2,078.56
Reporting Period	Miscellaneous - taxis, notary public, etc.	<u>124.60</u>

<u>\$5,791.51</u>
Total

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION
DEC 17 11 35 AM '81
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes XX or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Gary M. Welsh
Signature

12/11/81
Date

Gary M. Welsh

Please type or print name of
signatory on the line above

Partner

Title